

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMENDED INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL  
DEBT COALITION REGARDING ITS REQUEST TO BE HEARD  
AT THE JULY 24-25, 2019 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)<sup>2</sup> submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019, Omnibus Hearing* (Dkt. 7963) (the “Order”), and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The members of the LCDC and their respective holdings are set forth in the *Second Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019* (Dkt. 7465).

1. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, and Sylvia M. Arizmendi of Reichard & Escalera, LLC, co-counsel for the LCDC, plan to appear in person at the July 24-25 Hearing at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

2. Mr. Kirpalani intends to present argument regarding the following Documents (as defined in the *Tenth Amended Notice, Case Management and Administrative Procedures*, (Dkt. 8027-1)) filed by the LCDC:

- a. *Response of the Lawful Constitutional Debt Coalition in Support of the Financial Oversight and Management Board for Puerto Rico's Motion to Stay Contested Matters Pending Confirmation of Commonwealth Plan Of Adjustment* (Dkt. 7898);
- b. *Response of the Lawful Constitutional Debt Coalition in Support of the Plaintiff Financial Oversight and Management Board For Puerto Rico's Motion To Stay PBA Adversary Proceeding Pending Confirmation Of Commonwealth Plan of Adjustment* (Adv. Proc. 18-149-LTS, Dkt. 107);
- c. *Objection of the Lawful Constitutional Debt Coalition to the Renewed Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds* (Dkt. 7900).

3. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III case to the extent it impacts the rights, claims, or interests of the LCDC.

DATED: July 23, 2019

Respectfully submitted,

REICHARD & ESCALERA

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*Co-Counsel for the Lawful Constitutional Debt Coalition*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Carlos R. Rivera-Ortiz  
USDC-PR 303409